

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

NEELAM NASEER

6716 Tower Drive, Apt. 103
Alexandria, VA 22306

Plaintiff,

v.

JESSE JAMES

6924 Williamsburg Church Road
Hurlock, MD 21643

and

RYLEE HUTSON

6924 Williamsburg Church Road
Hurlock, MD 21643

Defendants.

Case No.:

* * * * *

COMPLAINT AND DEMAND FOR JURY TRIAL

Now comes the Plaintiff, Neelam Naseer, by Matthew B. Rogers and the Greenberg Law Office, her attorneys, and sues the Defendants, Jesse James, and Rylee Hutson, and as grounds states:

PARTIES

1.The Plaintiff, Neelam Naseer (hereinafter “Plaintiff” or “Naseer”), is an adult citizen residing in Fairfax County, in the state of Virginia. She is a person within the meaning of the Constitution of the United States and has been injured by the Defendants.

2.The Defendant, Jesse James (hereinafter "Defendant James") is an adult citizen residing in Dorchester County, in the State of Mayland. He is a person within the meaning of the Constitution of the United States and was the owner of the vehicle involved in the collision that

caused injury to the Plaintiff.

3.The Defendant, Rylee Hutson (hereinafter “Defendant Hutson”), is an adult citizen residing in Dorchester County, in the State of Maryland. He is a person within the meaning of the Constitution of the United States and was the driver of the vehicle involved in the collision that caused injury to the Plaintiff.

JURISDICTION AND VENUE

4.This Court has subject matter jurisdiction over this action due to the fact that it involves a serious motor vehicle collision that occurred at the intersection of South Main Street and Legion Drive, in Dorchester County, Maryland, on January 28, 2022.

5.That as the Plaintiff is a resident of Virginia, and the Defendants are both residents of the State of Maryland, there exists diversity of citizenship.

6.That venue is proper in this Court because the cause of action arose out of the negligent actions that occurred in Dorchester County, Maryland, which is within the jurisdiction of the Northern Division of the United States District Court for the District of Maryland.

FACTS

7.This case involves a serious motor vehicle collision that occurred on or about the 28th day of January 2022, when the Plaintiff, Neelam Naseer (“Naseer”), was driving her motor vehicle in a careful and prudent manner while traveling on northbound on South Main Street, at or near Legion Drive, in Dorchester County, Maryland.

8.At the same time and place, Defendant Hutson was operating a motor vehicle owned by Defendant James, in a careless, reckless, and negligent manner while traveling on Legion Drive, at or near South Main Street, in Dorchester County, Maryland.

9. Defendant Hutson took the right of way from Plaintiff Naseer when not permitted to do so when she ran the stop sign on Legion Drive.

10. That suddenly, without warning, and with great force and violence, the motor vehicle driven by Defendant Hutson, violently struck the motor vehicle of Plaintiff Naseer causing bodily injury and property damage.

11. That as a result of the negligence of the Defendants, and each of them, the Plaintiff was caused to sustain serious, painful, and permanent injuries in and about her head, neck, body, and limbs.

12. That the Plaintiff was caused to seek hospitalization, the services of medical doctors, to lose time from his gainful employment, and expend or become obligated to expend great sums of money for his medical care and treatment.

13. That the Plaintiff may be caused to seek additional hospitalization and/or medical services, lose additional time from his gainful employment, and expend or become obligated to expend additional sums of money in the future for his medical care and treatment.

COUNT I
NEGLIGENCE
(Against Defendant RYLEE HUTSON)

14. Plaintiff incorporates and restates by reference herein the allegations set forth in Paragraphs above.

15. Defendant Hutson owed a duty to the Plaintiff and all other drivers on the roadway to operate the vehicle owned by Defendant James in a safe and prudent manner, and to follow all traffic rules, and to avoid injuring others.

16. That said collision was caused solely by the carelessness, recklessness, and negligence of Defendant Hutson, who breached her duty by among other allegations, failing to keep the vehicle they were operating under proper control, failing to keep a proper lookout, failing to use reasonable care, failing to drive at a safe speed or operate with due caution, failing to follow a properly placed traffic control device, failing to grant the right of way to the vehicle of Plaintiff, and was otherwise careless, reckless, and negligent when she ran a stop sign and struck the motor vehicle of Plaintiff Naseer.

17. That as a result of the negligence of Defendant Hutson, Plaintiff Naseer was caused to sustain serious and painful and permanent injuries in and about her head, neck, body, and limbs, and was forced to suffer mentally and physically.

18. That the Plaintiff was caused to seek hospitalization, the services of medical doctors, and expend or become obligated to expend great sums of money for her medical care and treatment.

19. That the Plaintiff may be caused to seek additional hospitalization and/or medical services and expend or become obligated to expend additional sums of money in the future for her medical care and treatment.

20. And the Plaintiff says that the collision and the resulting injuries, damages, and losses were caused solely by the negligence of the Defendants, without any negligence on her part in any way contributing thereto.

WHEREFORE, this suit is brought and Plaintiff, Neelam Naseer, claims damages against the Defendant Rylee Hutson in the amount of ONE MILLION DOLLARS (\$1,000,000.00).

COUNT II
NEGLIGENT ENTRUSTMENT
(Against Defendant Jesse James)

21.Plaintiff re-states and incorporates all information in the proceeding Paragraphs.

22.Defendant James owed a duty to Plaintiff Naseer and all other drivers on the roadway to grant permission and consent to a driver who would operate his motor vehicle in a safe and prudent manner, follow all traffic rules, and avoid injuring others.

23.That said collision was caused solely by the carelessness, recklessness, and negligence of Defendant James who breached his duty by granting permission and consent to a driver who he should have known was unable to operate his motor vehicle in a safe and prudent manner, and who among other allegations, failed to keep the vehicle they were operating under proper control, failed to keep a proper lookout, failed to use reasonable care, failed to drive at a safe speed or operate with due caution, failed to follow a properly placed traffic control device, failed to grant the right of way to the vehicle of Plaintiff, and was otherwise careless, reckless, and negligent when Defendant Hutson ran the stop sign and struck the motor vehicle of Plaintiff Naseer.

24.That as a result of the negligence of Defendant James, Plaintiff Naseer was caused to sustain serious and painful and permanent injuries in and about her head, neck, body, and limbs, and was forced to suffer mentally and physically.

25.That the Plaintiff was caused to seek hospitalization, the services of medical doctors, and expend or become obligated to expend great sums of money for her medical care and treatment.

26.That the Plaintiff may be caused to seek additional hospitalization and/or medical services and expend or become obligated to expend additional sums of money in the future for her medical care and treatment.

27. And the Plaintiff says that the collision and the resulting injuries, damages, and losses were caused solely by the negligence of the Defendants, without any negligence on her part in any way contributing thereto.

WHEREFORE, this suit is brought and Plaintiff, Neelam Naseer, claims damages against Defendant Jesse James in the amount of ONE MILLION DOLLARS (\$1,000,000.00).

GREENBERG LAW OFFICE

/s/ Matthew B. Rogers, Esq.

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